

October 8, 2013

Ali Mirzakhali, Division Director
Division of Air Quality
Delaware Dept. of Natural Resources and Environmental Control
655 South Bay Road, Suite 5N
Dover, DE 19901

Re: Delaware Proposed Adoption of the Low Emission Vehicle Program

Dear Mr. Mirzakhali:

I am writing in response to the public hearing held on September 23rd of this year, regarding the adoption of the California Low Emission Vehicle Program, LEV III.

The slides presented at the public hearing show that the net cost to consumers in the year 2025 would be approximately \$1900 per vehicle, but that consumers would save \$12/month due to the increased fuel efficiency of such vehicles. The payback period was said to be 3 years. However, no data was provided to back up these claims. No data was provided on the assumptions made with respect to fuel cost, number of miles driven per month, the cost to manufacturers of increasing the warranty period, how the regulations would affect the overall lifetime of the vehicle (including repair cost), etc.

I requested this information for the 2015 and 2025 model years, on September 23rd. I was told that my request had been received, and that a response was being prepared. In the two weeks since I made that request, I have not yet received this information.

If DAQ had done an analysis of the economic impact of the proposed regulation, this information should have been readily available upon request. However, since it is not yet available after two weeks, I can only assume that the economic impact analysis was not actually performed by DAQ, and that the conclusions were simply taken from California's own analysis.

Since no information has been provided to the public about the economic impact of these proposed regulations in the *first* year after they go into effect (the 2015 model year), and since the conclusions shown in the public presentation at the September 23rd hearing have not been backed up by real data, I cannot support this regulation.

Much has been made of the fact that this regulation would result in vehicles that have increased fuel economy, and that the regulation will be good for consumers because they will spend less on fuel. However, if consumers really want more fuel efficient cars, they have the option of telling the auto manufacturers that, by buying fuel efficient cars. If enough people want fuel efficient cars, the auto manufacturers will provide them or go out of business, replaced by manufacturers who respond to consumer demand. It is not the government's job to dictate to its citizens what kind of vehicle they must buy, or how fuel efficient it must be.

Please do not enact this regulation. It will hurt new car buyers in the form of increased up-front cost for *all* new vehicles, and it will hurt used car buyers in the form of increased repair costs over the lifetime of the vehicle.

Sincerely,

Aaron Wright
Concerned Citizen

CC: Collin O'Mara
Deanna Cuccinello